

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

CARMEN CONSOLINO, <i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 17-cv-09011
)	
v.)	The Honorable Judge Robert Dow
)	
THOMAS J. DART, <i>et al.</i> ,)	
)	
Defendants.)	

JOINT STATUS REPORT PURSUANT TO DKT. 110

NOW COME, the parties, jointly through their respective counsels, Cass T. Casper, Disparti Law Group, P.A., for Plaintiffs, and Justin L. Leinenweber, Leinenweber Baroni & Daffada, LLC, and Ethan White, Emery Law, Ltd., for Sheriff's Defendants, and Michael Kuczwar, Jr. and David Cascio, Esq., Laner Muchin, for Defendant Cook County, Illinois, and report as follows on the status of the above-captioned cause pursuant to this Court's September 8, 2021 order for a status report (Dkt. 110).

I. Request For Extension Of Fact Discovery Cutoff Until April 30, 2022.

1. Plaintiffs' depositions are set for various dates in February and are anticipated to be completed no later than February 16, 2022, with the schedule being as follows: Antonio Belk 2/3/2022, Victor Thomas 2/7/2022, Cynthia Chubb, 2/9/2022, Carmen Consolino, 2/11/2022, Andres Garcia, 2/14/2022, Aretha Germany 2/16/2022.

2. Defendants are working to provide dates for the individual party Defendants in January, February or March 2022, but Defendants' counsel reports that the primary contacts with the Cook County Sheriff's Legal Department in charge of deponent scheduling have been out with COVID-19 and/or one of its variants, and have been unable to confirm dates. The parties are working amicably to obtain and confirm dates.

3. Plaintiff's counsel is seeking the deposition of a third party witness, Karyn Williams, and is attempting to organize dates with all parties, but advises that she is represented and her counsels must confirm dates as well.

4. During the last discovery period, the parties have exchanged numerous documents and, while written discovery is not closed and is ongoing, substantial progress has been made.

5. The parties anticipate this being their last request for an extension in light of numerous prior extensions.

CONCLUSION

For the foregoing reasons, all parties jointly request an extension of the discovery cutoff to April 30, 2022.

Respectfully submitted,

/s/ Cass T. Casper
/s/ Navarrio Wilkerson

Counsels for Plaintiffs
Cass T. Casper, Esq. / Navarrio Wilkerson, Esq.
DISPARTI LAW GROUP, P.A.
121 West Wacker Drive, Suite 2300
Chicago, Illinois 60601
P: (312) 506-5511 ext. 331
E: ccasper@dispartilaw.com

Respectfully submitted,

/s/ Justin Leinenweber
/s/ Ethan White

Counsels for Defendant Dart
Justin Leinenweber, Esq.
Leinenweber Baroni & Daffada, LLC
120 North LaSalle Street, #2000
Chicago, Illinois 60602
P: (312) 380-6635
E: justin@ilesq.com

Ethan White, Esq.
Emery Law, Ltd.
2021 Midwest Road, Suite 200
Oak Brook, Illinois 60523
P: (630) 984-0339
E: ewhite@emerylawltd.com

Respectfully submitted,

/s/ Michael Kuczvara, Jr.
/s/ David Cascio

Counsels for Cook County, Illinois
Michael Kuczwara, Esq.
David Cascio, Esq.
LANER MUCHIN
515 North State Street, Suite 2800
Chicago, Illinois 60654
P: (312) 467-9800
E: mkuczwara@lanermuchin.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the foregoing document on all counsel of record via this Court's CM/ECF filing system on December 30, 2021, and that all such counsels are registered e-filers.

/s/ Cass T. Casper
